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6 Attorneys for Defendants
7 COUNTY OF SOLANO (erroneously sued as SOLANO
COUNTY SHERIFF'S OFFICE), SHERIFF THOMAS
8 A. FERRARA, DALTON MCCAMPBELL, LISA
MCDOWELL, ROY STOCKTON, CONNOR
9 HAMILTON, and CHRIS CARTER

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12 NAKIA V. PORTER, an individual on her
own behalf and on behalf of her minor
children, L.P. and A.P.; JOE BERRY
13 POWELL, JR., an individual; and CLIFTON
POWELL, on behalf of his minor child, O.P.,

14 Plaintiffs,
15 v.

16 COUNTY OF SOLANO; SOLANO
COUNTY SHERIFF'S OFFICE; SHERIFF
THOMAS A. FERRARA, in his official
capacity as Sheriff of Solano County;
17 DEPUTY DALTON MCCAMPBELL, an
individual; DEPUTY LISA MCDOWELL, an
individual; SERGEANT ROY STOCKTON,
an individual; DEPUTY CONNOR
18 HAMILTON, an individual; DEPUTY CHRIS
CARTER, an individual; CITY OF DIXON;
DIXON POLICE DEPARTMENT; DIXON
19 POLICE CHIEF ROBERT THOMPSON, in
his official capacity as Dixon Chief of Police;
OFFICER GABRIEL HOLLINGHEAD, an
individual, OFFICER AARON WILLIAMS,
an individual, and DOES 1 to 10, inclusive,

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21 Defendants.
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Case No. 2:21-cv-01473-KJM-JDP

**STIPULATION AND ORDER FOR
PSYCHIATRIC EXAMINATION OF
PLAINTIFF JOE BERRY POWELL, JR.**

Judge: Hon. Kimberly J. Mueller

1 It is hereby stipulated by and between Plaintiffs Nakia Porter, Joe Berry Powell, Jr. and
2 minors A.P., L.P., and O.P., and Defendants County of Solano, Sheriff Thomas A. Ferrara,
3 Dalton McCampbell, Lisa McDowell, Roy Stockton, Connor Hamilton and Chris Carter
4 (“Solano County Defendants”) through their counsel of record, as follows:

5 1. Plaintiff Joe Berry Powell, Jr. will appear for a mental examination pursuant to
6 Federal Rule of Civil Procedure 35, to be conducted by Dr. Alexandra Clarfield, Ph.D. a licensed
7 clinical psychologist (California License Number 25459) on February 21, 2024 at 10:00 a.m.,
8 which will be conducted at 1223 High Street, Suite C-1, Auburn, California 95603.

9 2. The examination is expected to last approximately four hours. Plaintiff Joe Berry
10 Powell, Jr. will be permitted periodic breaks during the examination. Plaintiff
11 Joe Berry Powell, Jr. will also be permitted time for a lunch break. Time used for breaks is not
12 included in calculating the time for the examination.

13 3. The examination will consist of a clinical interview by Dr. Clarfield, and an
14 administration of standard psychological tests. The psychological testing may include the
15 following: MMPI-2; Rorschach; Clinical Administered PTSD Scale; Beck Depression
16 Inventory; Wexler Memory Scale; Inventory of Problems (IOP) 29. Dr. Clarfield may
17 administer additional tests if the need for them is suggested by her interview with Plaintiff Joe
18 Berry Powell, Jr. However, if any such additional tests are administered, they will not add to the
19 length of the examination and will be standardized, accepted tests. In advance of the
20 examination, Plaintiff Joe Berry Powell, Jr. will be provided with an intake form, which he will
21 complete and provide in advance of the examination.

22 4. No third party(ies), including but not limited to the parties' attorneys of record,
23 will be permitted to present during any portion of the examination.

24 5. This stipulation will not be deemed to incorporate all of the provisions of Rule 35;
25 specifically, it does not include the rules for exchange of medical or psychological reports and
26 waiver of privilege.

27 6. The examination will not be recorded by audio or video.
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Hawkins Parnell & Young LLP
ATTORNEYS AT LAW

DATED: February 9, 2024

By: /s/ Yasin M. Almadani*

YASIN M. ALMADANI
AHMED IBRAHIM
Attorneys for Plaintiffs
NAKIA PORTER, JOSEPH BERRY
POWELL, minors L.P., A.P., and O.P.

DATED: February 9, 2024

HAWKINS PARNELL & YOUNG LLP

By: /s/ Danielle K. Lewis

DANIELLE K. LEWIS
MILES F. MAURINO
Attorneys for Defendants
COUNTY OF SOLANO (erroneously sued
as SOLANO COUNTY SHERIFF'S
OFFICE), SHERIFF THOMAS A.
FERRARA, DALTON MCCAMPBELL,
LISA McDOWELL, ROY STOCKTON,
CONNOR HAMILTON, and CHRIS
CARTER

* I have authorization from the above-named counsel to e-file this document.

ORDER

The parties having stipulated thereto, **IT IS SO ORDERED.**

Dated: February 16, 2024.


Danielle K. Lewis
CHIEF UNITED STATES DISTRICT JUDGE